

REMARKS

In view of the following remarks, Applicant respectfully requests reconsideration and allowance of the subject application. This amendment is believed to be fully responsive to all issues raised in the Office Action mailed
5 December 22, 2004.

Rejections Under 35 U.S.C. §103

Claims 1-20 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,343,324 to Hubis (hereinafter, "the '324
10 patent") in view of U.S. Patent No. 6,374,336 to Peters (hereinafter, "the '336 patent"). Applicants traverse the rejections.

Claim 1 stands rejected over the '324 patent in combination with the '336 patent. Applicants traverse this rejection, and asserts that the Action fails to establish a *prima facie* case of obviousness.

15 To establish a *prima facie* case of obviousness, the Action must establish that each element of the claim is disclosed or suggested by the cited references. See, MPEP 2142. The Action acknowledges that the '324 patent fails to disclose or suggest providing notification to the storage resource user that a resources provider is available on the storage network,
20 and cites column 20, line 60 through column 21, line 65 of the '336 patent to compensate for the deficiencies in the '324 patent. Applicants disagree. A careful review of the cited text reveals that the cited text neither discloses nor suggests *providing notification to the storage resource user that a resource provider is available on the storage area network*, as recited in

claim 1. Absent such a disclosure or suggestion in the cited references, the Action fails to establish a *prima facie* case of obviousness.

Claims 2, 12, and 19 appear to stand rejected over the '324 patent in combination with the '336 patent. Applicants traverse this rejection, and
5 asserts that the Action fails to establish a *prima facie* case of obviousness.

Applicants note that claim 2 depends from claim 1 and is allowable by virtue of this dependency. In addition, claim 2 recites a limitation directed to storing identifying indicia in a table of not-yet-approved entities if the resources are not available to the requesting storage resource user. The
10 Action appears to assert that the '334 patent discloses the claimed subject matter, and cites column 10, line 64 through column 13, line 67 to support the rejection. Applicants disagree. A careful review of the '334 patent reveals that the cited text neither discloses nor suggests storing identifying indicia in a separate not-yet-approved table, as recited in claim 2. Absent
15 such a disclosure or suggestion in the cited references, the Action fails to establish a *prima facie* case of obviousness.

Similarly, independent claim 12 recites a limitation directed to *storing, in a table of not-yet-approved entities in volatile memory in the controller, indicia of any of the at least one storage resource user that have not been*
20 *granted access to data storage areas on disks in the storage array.* A careful review of the '334 patent reveals that the cited text neither discloses nor suggests storing identifying indicia in a separate not-yet-approved table, as recited in claim 12. Absent such a disclosure or suggestion in the cited references, the Action fails to establish a *prima facie* case of obviousness.

Independent claim 19 recites limitations directed to a first table of approved entities for storing indicia of data storage areas and the storage resource user to which the areas are accessible, and a second table of non-approved entities for storing indicia identifying storage resource user entities

5 that are not presently allowed access to any resources on the storage area network. A careful review of the '334 patent reveals that the cited text neither discloses nor suggests storing identifying indicia in a separate not-yet-approved table, as recited in claim 19. Absent such a disclosure or suggestion in the cited references, the Action fails to establish a *prima facie*

10 case of obviousness.

The remaining claims depend ultimately from one of independent claim 1, 12, or 19, and are allowable by virtue of this dependency and by virtue of the limitations recited there. By way of example, Applicants note that dependent claims 8 and 15 recite limitations directed to uploading

15 available resources and not-yet-approved entities to a management station, selecting a user identity and set of resources to be made available to the user, sending a list of selected resources to the resource provider, allocating to the user the resources included in the list, and presenting to the user the allocated resources. The Action asserts that the '324 patent discloses these

20 limitations and cites column 21, lines 20-65. Applicants disagree. A careful review of the '324 patent reveals that the cited text neither discloses nor suggests the limitations recited in claims 8 and 15. Nor does the cited text disclose or suggest the state transition information suggested in the Action. Absent such a disclosure or suggestion in the cited references, the Action

25 fails to establish a *prima facie* case of obviousness of claims 8 and 15.

CONCLUSION

Claims 1-20 are in believed to be in condition for allowance.

Applicant respectfully requests reconsideration and prompt issuance of the present application. Should any issue remain that prevents immediate

5 issuance of the application, the Examiner is encouraged to contact the undersigned attorney to discuss the unresolved issue.

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Respectfully Submitted,
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